

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

(1) KIM LOCKWOOD AND)	
(2) V. KATHLEEN LOCKWOOD,)	
)	
Plaintiffs,)	
)	
v.)	Case No.: CIV-23-170-R
)	
(1) STATE FARM FIRE AND)	
CASUALTY COMPANY,)	
)	
Defendant.)	

NOTICE OF REMOVAL

1. State Farm Fire and Casualty Company (“State Farm”) is Defendant in a civil action brought against it in the District Court of Oklahoma County, State of Oklahoma, and titled *Kim Lockwood and V. Kathleen Lockwood, Plaintiffs, v. State Farm Fire and Casualty Company, Defendant*, Cause No. CJ-2022-4242.

2. Upon information and belief, at the time of the filing of this action and at the present time, Plaintiffs Kim Lockwood and V. Kathleen Lockwood were and are residents and citizens of the State of Oklahoma. At the time of the filing of this action and at the present time, State Farm was and is a foreign corporation, duly organized and existing under the laws of the State of Illinois and no other state, with its principal place of business in Illinois; it is not a citizen of Oklahoma.

3. Plaintiffs claim to be entitled to recover an amount exceeding that specified by 28 U.S.C. §1332 to invoke federal diversity jurisdiction and, therefore, the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. This is the kind of action of which the United States District Courts have original jurisdiction because of diversity of citizenship and sufficiency of amount in controversy.

5. The aforementioned action was commenced by service of summons upon the Oklahoma Department of Insurance by personal service on February 3, 2023. This Notice of Removal is, therefore, timely filed under the provisions of 28 U.S.C. § 1446.

6. A copy of the docket sheet and copies of all process, pleadings and orders filed or served upon Defendant in the aforementioned state action are attached hereto, marked Exhibits 1-4 and made a part hereof.

Respectfully submitted,

/s/ Timila S. Rother

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ATTORNEYS FOR DEFENDANT

STATE FARM FIRE AND CASUALTY

COMPANY

CERTIFICATE OF SERVICE

I certify that on February 21, 2023, the same date this Notice of Removal was filed in the United States District Court for the Western District of Oklahoma, a true and correct copy of said Notice of Removal was served upon the above-named plaintiffs by mailing said copies to the parties' attorneys of record:

Terry M. McKeever
S. Alex Yaffe
FOSHEE & YAFEE
P.O. Box 890420
Oklahoma City, OK 73189

and further that a copy of said Notice of Removal was delivered to the Oklahoma County Court Clerk for filing on the 21st day of February, 2023.

/s/ Timila S. Rother

Timila S. Rother